

) CASE NO. CV 05-0019
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February 21, 2006

A P P E A R A N C E S:

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Official Translator (Korean)

STIPULATIONS: NONE.

1 KIM PIL SUN KITAMI,
2 having first been duly sworn by the Notary Public Mark B. Hanson, was examined and
3 testified as follows:

4 EXAMINATION BY MR. HANSON:

5 MR. HANSON: Okay. Good morning. This is the 21st day of February; we're
6 at the offices of Mark Hanson. This is a deposition in the case of Li Ying Hua et al
7 verses Jung Jin Corporation et al; civil case number 050019; third party deposition of Pil
8 Sung Kim Kitami pursuant to a subpoena.

9 My name is Mark Hanson, I'm an attorney for plaintiffs, I'm also the officer for
10 this deposition.

11 Present today is Mr. Steve Nutting for the defendants, the deponent Miss Kitami,
12 her attorney Richard Pierce is here. They have a check translator.

13 What's your name?

14 TRANSLATOR: Jae Jung Kim.

15 MR. HANSON: Can you spell that for me please?

16 TRANSLATOR: J-A-E J-U-N-G, last name is Kim, K-I-M.

17 MR. HANSON: Okay. And the translator for the deposition will be Mr. Alex
18 Tae.

19 Is everybody comfortable? It's a little warm in here right now because we just
20 turned the air-con on a little while ago. Is there anything else I can get anybody before
21 we start?

22 MR. HANSON: Okay. Before we start I need to put you under oath, Miss
23 Kitami. Can you raise your right hand? Now, do you swear to tell the truth, the whole

1 truth and nothing but the truth in this deposition here today?

2 THE WITNESS: Yes I do.

3 MR. HANSON: Okay. Now, you understand that you're now under oath and
4 everything you say needs to be fully true or you could be prosecuted for perjury?

5 THE WITNESS: Yes.

6 MR. HANSON: Okay.

7 Q. Just some preliminary questions. Can you please state your full name for
8 us?

9 A. Kim, K-I-M, Pil Sung.

10 A. (in English) K-I-M S-U-N -- P-I-L S-U-N.

11 A. P-I-L S-U-N.

12 A. (in English) Kim.

13 A. K-I-M.

14 A. (in English) Yeah.

15 Q. And do you have a married name?

16 A. (in English) Kitami. K-I-T-A-M-I.

17 Q. Kitami, K-I-T-A-M-I.

18 When did you start using the name Kitami?

19 A. I got married when I was 42 years old.

20 Q. What year was that?

21 A. Back in 1992. '92 or '93.

22 Q. And since 19 -- since your marriage have you been using the -- the name
23 Kitami at the end of -- of your maiden name?

1 A. No not necessarily. I have been using my name too.

2 Q. So sometimes you use Kim Pil Sung Kitami or Pil Sung Kim Kitami, I'm
3 sorry and sometimes just Kim Pil Sung?

4 A. After the marriage I have been using my married name Kitami.

5 Q. Do you use that for all of the -- of the documents that you sign?

6 A. Yes.

7 Q. So it's safe to say after your marriage in 1992 or 1993 that all the
8 documents that have your name on it show it as Pil Sung Kim Kitami?

9 A. Yes after the marriage.

10 Q. Where were you married Mrs. Kitami?

11 A. In Saipan.

12 Q. How long have you lived in Saipan?

13 A. Approximately 24 years. I first came down here in 1983.

14 Q. Okay. And you -- have you -- you have a home here?

15 A. Are you asking me how I came to Saipan?

16 Q. Okay. How did you come to Saipan?

17 A. My sister and brother-in-law works for Kan Pacific Corporation and they
18 hired me as a -- as a cook here in Saipan. That's how I got here.

19 Q. In -- when was that?

20 A. That was 1983.

21 Q. How long did you work as a cook?

22 A. Approximately 15 years.

23 Q. So some time in 1998 you stopped your job as a cook?

1 A. I'm currently -- I work as a person in charge of the department up until
2 now and I've been working as a cook all this time.

3 Q. Okay.

4 MR. HANSON: Alex, can you have Miss Kitami move the water bottle over to
5 her -- there you go, because it's right in the video.

6 Q. Okay. When you came in 1983 to work as a cook what company were
7 you working for?

8 A. (in English) Kan Pacific, Marianas Restaurant.

9 Q. Is that the same company with which you're still working?

10 A. (in English) Yes, sir.

11 Q. Have you ever worked for any other company?

12 A. Only worked for the company.

13 Q. And you said you're now a manager, a supervisor?

14 A. I am the owner.

15 Q. You're the owner. Is that by your marriage to Mr. Kitami?

16 A. As far as I know my name is the vice president of Marianas Restaurant
17 and my husband is listed as the president of the Marianas Restaurant and this was after I
18 opened up a restaurant called -- Korean restaurant called Nam Dae Moon and it was
19 closed down after a while.

20 Q. What's your husband's name?

21 A. Kitami Noaoki.

22 Q. Now, you say Marianas Restaurant. Where is that located?

23 A. Top of the hospital, Navy Hill.

1 Q. And you still cook there now?

2 A. (in English) Now not so.

3 A. Due to my physical condition I don't work -- I don't cook but I do help out
4 when -- when it's necessary.

5 Q. When did Marianas Restaurant start its operation?

6 A. In 1983.

7 Q. So when you -- about the time that you came to -- to Saipan?

8 A. Yes at the same time I -- I came down here to open the -- not to open it but
9 at the same time as the -- the restaurant was opened.

10 Q. Were you -- were you the first owner -- were you an owner of the
11 Marianas Restaurant when it first began?

12 A. No, my husband was.

13 Q. But you weren't married to your husband at that point?

14 A. No.

15 Q. So you were just a regular employee of the company but not an owner and
16 employee in 1983?

17 A. Yes.

18 Q. When did you become a -- when did you become a part owner of the
19 restaurant?

20 A. About the time when I opened a Korean restaurant called Nam Dae Moon
21 that's when I became part owner of Marianas Restaurant. The reason for that is my
22 husband also owns the -- part owns the Korean restaurant called Nam Dae Moon.

23 Q. How do you spell the name of that restaurant?

1 A. Nam Dae Moon, it's N-A-M D-A-E M-O-O-N.

2 Q. Is that restaurant still operating?

3 A. No, it's closed down. It's closed down.

4 Q. When was it open? When was this that you started this restaurant?

5 A. I can't exactly recall the exact time but it was around four years ago.

6 Q. When Nam Dae Moon started?

7 A. Approximately, yes. It was after the -- what was that -- the disease?

8 Q. SARS.

9 TRANSLATOR: Not the SARS, but cows.

10 MR. KIM: The mad.

11 MR. HANSON: Foot and mouth.

12 MR. KIM: The mad cow disease.

13 MR. HANSON: Mad Cow Disease.

14 Q. When did it close?

15 A. I was -- I was ill, sick at the time and I was in Korea when my husband
16 closed down the restaurant.

17 Q. When was that?

18 A. Could have been year before last year, I'm not too sure.

19 Q. Are you doing any business now?

20 MR. PIERCE: In what, restaurant?

21 MR. HANSON: Is that an objection?

22 MR. PIERCE: Yeah.

23 MR. HANSON: Okay.

1 Q. Are you doing any business now?

2 MR. PIERCE: Objection; vague and ambiguous.

3 A. Yes. My husband and I do -- do some rents for apartments.

4 Q. Okay. Is that -- is there a company that operates the apartments that
5 you're an owner of?

6 A. I think it's -- I think it's private owned, it's not company.

7 Q. Does the -- the private owned -- does the private owner have a name other
8 than -- does the private owner have a name?

9 A. I think my name and my husband's name are listed as the private owner.

10 Q. Is there a DBA for that -- that business?

11 A. I'm not too sure about that but the name of the apartment is called YNP.

12 Q. Do you know what that stands for?

13 A. Yes, my friend -- my friend and I built this apartment and it's an
14 abbreviation of my friend's name and my name.

15 Q. What's your friend's name?

16 A. Yun Hee Park.

17 Q. Y-O-O-N H-E-E P-A-R-K; is that correct?

18 A. Or Y-U-N.

19 Q. Or Y-U-N. Okay.

20 How long ago did you build that apartment?

21 A. Probably in -- ten years ago, around ten years ago or a little more.

22 Q. Where did you get the money to build the apartment?

23 A. I brought a portion from Korea and -- and some from here, from what I

1 earned.

2 Q. You brought a portion from Korea, how much did you bring from Korea?

3 A. Together with my friend we brought about \$100,000.

4 Q. And that was about ten years you said?

5 A. Ten years or a little more. I'm not sure when it was built; I'm kind of lost
6 in the time frame.

7 Q. So you had -- you had money -- at that time you had money in -- in Korea
8 that you could use for your business in Saipan?

9 A. Yes. I had a house in Korea and how I brought the money I -- I -- I did a
10 mortgage with the house and got a loan from the bank.

11 Q. When -- when did you do that -- when did you take out that loan in Korea?

12 A. I'm not sure. It could have been in the '80s or '90s.

13 Q. How much money did you borrow against your house?

14 A. \$50,000. It's \$50,000 per -- per party, me and my friend, came out to be
15 \$100,000. And by -- instead of -- as for my friend instead of bringing in -- bringing the
16 cash she brought -- she brought -- she brought furnitures for the apartments, such as bed,
17 anything that was needed for the apartments.

18 Q. How much money did you have in Saipan, the portion that you used to
19 start the apartments, build the apartments?

20 A. \$100,000.

21 Q. So you had \$100,000 in Saipan already and you brought \$50,000 more
22 each from Korea; is that correct?

23 A. No, \$100,000 was all I had, but how -- what happened was at that time my

1 -- my husband, he wasn't my husband back then he was my boss, but my husband back
2 then was -- did also a construction company and we were told that we -- we only have to
3 put in \$50,000 to have the construction started and the company, my husband's company
4 would go ahead and finish the building and take the -- take the income out of -- out of --
5 out of the rent as for their construction cost.

6 Q. And is that because you didn't have enough money to pay for the
7 construction in advance?

8 A. Yes, but not necessarily. How -- the whole thing started because my boss
9 back then promised me that all I need is \$50,000 to get it started, that's how I got a
10 mortgage from Korea and had it started here.

11 Q. Since that mortgage, have you ever mortgaged your house in Korea again?

12 A. No.

13 Q. Since that loan where you mortgaged your house in Korea for the
14 apartments, have you ever borrowed any money from any banks in Korea?

15 A. No.

16 Q. At the time you were trying to build the apartments did you have any
17 money in a bank in Korea, any money at all in any bank accounts?

18 A. I don't remember. It's been over 20 years, it's in the '80s and I can't
19 recall my memory. What I've earned from here -- I spent all my money or all my
20 expenses from what I've earned from Saipan and I don't remember how much I had or
21 whether I had any money in the bank in Korea or not.

22 Q. If you had had \$50,000 in the bank in Korea at the time you were trying to
23 build the apartments would you have used that \$50,000 or would you still have just

1 gotten a loan?

2 A. I definitely didn't have \$50,000 in my account back then that's why --
3 that's how I got this mortgage. That's how I got this mortgage.

4 Q. So is it fair to say if you did have any money in the bank in Korea at the
5 time you were building these apartments it was only a little bit of money?

6 A. Yes, small amount.

7 Q. How about in Saipan, did you have any money in the bank then in Saipan?

8 MR. PIERCE: Objection; as to time.

9 A. I did save a little but not that much, not a large amount of money.

10 Q. And this was back when you were building the apartment, right?

11 A. Yes.

12 Q. What's a little bit of money, maybe a \$1000?

13 A. I don't know, maybe -- I don't remember.

14 Q. How did the apartments -- never mind that. You said that your husband's
15 construction company took the rents from the building -- for the apartments for a certain
16 period of time to pay back the construction costs; is that right?

17 A. No not necessarily. I urgently needed the cash back then and I took most
18 of the income out of the -- that was made out of the apartment, but it's all paid off now,
19 after I got married to my husband.

20 Q. Why did you urgently need the cash back then?

21 A. Because I -- I opened up a restaurant, Korean restaurant, in between Grand
22 Hotel and Diamond back then it's now called -- named World Resort and I lost about
23 \$200,000 by opening up that restaurant.

1 Q. When was -- when did you open that restaurant?

2 A. I don't remember.

3 Q. Was it 20 years ago?

4 A. Not that long ago -- but not that long ago. It's either end of '80s, late '80s,
5 either 1989 or in the '90s.

6 Q. Is it about the same time as you were constructing the apartment building?

7 A. It was after the completion of the apartments.

8 Q. So after the completion of the apartments you open up a restaurant in -- in
9 Susupe? Is it far to say that's Susupe?

10 A. Yes. The apartment is located at the -- the back of duty free.

11 Q. Okay. And the restaurant is located in -- was located in Susupe?

12 A. I'm not sure what -- what village that is.

13 Q. Okay. We'll just say near the Joeten.

14 A. It was -- it's across Joeten.

15 Q. So some time after you finished the apartments in Garapan you opened up
16 a restaurant near the Joeten in -- near the Joeten?

17 A. It was probably after a year or two when I opened this restaurant.

18 Q. And you lost \$200,000 in that business?

19 A. Yes and that's how I couldn't pay off the debt from the -- from the
20 company, construction company. Correction: to the construction company.

21 Q. That \$200,000 that you lost, was that money that you had earned from the
22 apartment rents?

23 A. No, this -- this money was borrowed from my friends and in order for me

1 to pay off my -- my debt to my friends I could not pay anything to the construction
2 company.

3 Q. Who are the friends that you borrowed the money from?

4 A. All the friends that I borrowed money from they all went back to Korea,
5 none of -- not one of them is here.

6 Q. Are any of the friends -- let me just ask you this to eliminate -- was Miss
7 Park Hwa Sun one of the friends you borrowed money from?

8 MR. PIERCE: Objection; vague and ambiguous as to who you're talking about.

9 A. Yes.

10 Q. So was Mr. Kim Hang Kwon someone that you borrowed money from?

11 A. Can you pronounce the name again?

12 Q. K-I-M H-A-N-G K-W-O-N; better I don't try to pronounce it.

13 A. No -- no, only from his wife.

14 Q. And that was Miss Park Hwa Sun?

15 A. Yes.

16 Q. Miss Park Hwa Sun loaned you -- how much money did Miss Park loan
17 you?

18 MR. PIERCE: Objection; vague as the terms.

19 A. She's a long time friend of mine and I don't remember exact amount of
20 how much the money was borrowed, but in between \$5000 to \$20,000 we -- we just lend
21 it out to each other.

22 Q. Was it more than \$20,000 in this case?

23 MR. PIERCE: Objection; vague as to terms and circumstances.

1 A. Probably not. I don't borrow any amount that's bigger than \$20,000.

2 Q. Now, to be clear, we're talking about the \$200,000 that you put into this
3 restaurant business near the Joeten, right?

4 A. I didn't borrow any money from her at that time, no, not in that case.

5 Q. So you borrowed money from Mrs. Park after that time?

6 A. I first borrowed money from her at -- in the '90s after I closed down --
7 dropped out -- dropped down other business that I was running.

8 Q. Okay. So let's back up a little bit. What's the name of this restaurant near
9 the Joeten?

10 A. It's called Yakiniku.

11 Q. Can you spell that please?

12 A. Y-A-K-I-N-I-K-U. It's in Japanese. I'm not sure what it's called in --
13 called in Korean.

14 Q. And to be clear, you opened that up a year or two after you had finished
15 the apartments in Garapan?

16 A. I can't -- I can't clearly remember. It could have been after three to four
17 years.

18 Q. And how long was that restaurant open?

19 A. Not that long. As soon as I opened this restaurant I, a close friend of mine
20 who is a local here, a Chamorro, the person started giving me a hard time that's how I
21 was able to close down the restaurant and -- and stay with my husband, because back
22 then I was already married with my husband.

23 Q. So Yak—

1 A. (in English) Yakiniku.

2 Q. Yakiniku you opened after you were married?

3 A. Probably.

4 Q. And you had borrowed \$200,000 from friends that you put into that
5 business?

6 A. Yes. That's how my -- my payment to the construction company was
7 delayed because I have to pay off my debts to my friends first.

8 Q. And you used the rents from the apartment building to pay off that
9 \$200,000 debt?

10 A. Yes.

11 Q. How long did that take to pay off the \$200,000?

12 A. About a year and a half -- between year and a half to two years.

13 Q. And after that then you started -- then the rents from the apartments started
14 going back to the construction company again to pay for the construction of the
15 apartments?

16 A. Yes.

17 Q. How long did it take to pay off the construction company for the
18 construction costs?

19 A. I wouldn't know because my -- my husband handle all of this case and my
20 husband is not the sole owner of the company it was -- he was -- he's in partners with his
21 brother. What I'm assuming -- what I know is -- as far as I know, my husband must have
22 paid the debt that I borrowed in loss out of his pocket and just got the monthly income
23 from the apartment on his own.

1 Q. Was there ever a time where you started receiving the monthly income
2 from the apartments again?

3 A. No, it was always deposited to the company and then the company would
4 pay me.

5 Q. Was this YP -- YP --

6 A. (in English) Apartments.

7 Q. YP Apartments?

8 A. Not too sure. I'm -- I'm assuming it's depositing into YNP Company after
9 all the debt has been paid off.

10 Q. Is Yun Hee Park still in Saipan?

11 A. (in English) Yes, sir.

12 Q. Yun Hee Park still a part owner of the apartments?

13 A. No not anymore. We already -- me and my husband are the sole owners
14 of the apartment.

15 Q. When did Yun Hee Park stop -- become not an owner? Let me rephrase
16 that. When was it that Yun Hee Park wasn't a part of the business anymore?

17 A. I'm not sure of the time frame but it was after her kids graduated from
18 college in the States.

19 Q. Was that ten years ago? When was that?

20 A. Not too sure. I should have some kind of document stated when I became
21 the -- when my -- me and my husband became the sole owner of the -- the apartments.

22 Q. Do you -- do you know anything about this -- the case that you're here in
23 this deposition about today?

1 A. Am I here because the mortgage that I have with Hwa Sun Park?

2 Q. Okay. You have a mortgage with Hwa Sun Park? Is that what you're
3 saying?

4 A. Yes, because she wasn't paying.

5 Q. Okay. What does that have to do with this lawsuit?

6 A. Because they are -- because she's involved in a lawsuit and I'm -- I'm a
7 little nervous by -- by -- with -- by she might just lose everything and this is the last thing
8 that I would at least get some portion out of it.

9 Q. Out of what?

10 A. Out of my -- my -- as a security, at least she won't be able to sell the
11 property without my permission, my -- my consent.

12 Q. So you -- you -- you got a mortgage after you found out about this
13 lawsuit?

14 MR. PIERCE: Objection; vague and ambiguous; we assume she knows what you
15 mean by this lawsuit.

16 A. .Yeah.

17 Q. And you did that to make sure that Miss Park couldn't sell the house?

18 A. Yes and to get my money back.

19 Q. Okay. Now, when I say the house, do you -- what house -- never mind
20 that. What is the mortgage -- what property does the mortgage cover?

21 A. The place, the property that she's living in, currently living in.

22 Q. And that's the one you were worried about her selling without your
23 permission?

1 A. Yes.

2 Q. Now, when I said this case that you came here to testify about today, when
3 is the first time you heard that there was a lawsuit against Mrs. Park?

4 A. I wasn't here the whole time, I came back from Korea in November last
5 year and that's when I first heard about it.

6 Q. November 2005?

7 A. Yes.

8 Q. How long were you in -- how long had you been in Korea before you
9 returned in November?

10 A. I -- I -- I go to Korea often and every time I go I most likely stay between
11 a month and a half to two months.

12 Q. So on that trip when -- when had you gone to Korea? When did you go to
13 Korea?

14 A. I don't remember, maybe around September. I'm not too sure. I've got to
15 check my passport.

16 Q. And you say you found out that there was a lawsuit, there was a case
17 against Mrs. Park upon your return from Korea in November; is that right?

18 A. Yes.

19 Q. How did you find out?

20 A. There was a rumor going on and after I heard about that I went to Park
21 Hwa Sun and asked her about it and she told me that she is involved in a lawsuit and
22 that's how I mortgaged the property.

23 Q. What was the rumor?

1 A. She's in -- legal battle between her and her employees.

2 Q. Is that all she said?

3 A. Yes.

4 Q. Was there anything else to the rumor?

5 A. No.

6 Q. So you -- you went and talked to Mrs. Park?

7 A. Yes and that's how I went to her and asked for -- asked for the mortgage.

8 Q. When was it that you went to her and asked for the mortgage?

9 A. I'm not sure when I went to her but it was after I came back from Korea, it
10 was after I heard about the rumor then I went to her and asked for the mortgage.

11 Q. Well, was it a week after you came back?

12 A. Probably been more than that.

13 Q. Was it two weeks?

14 A. Maybe.

15 Q. Was it a month?

16 A. I'm not too sure but it could have been more than a month, I'm thinking
17 it's less than a month. It was when I went to golf with my friends and heard about it and
18 I went to her place and asked her.

19 Q. Okay. You went to her place and what did you ask her?

20 A. I heard -- I asked her -- I heard she has a lot of debt with other people and
21 I asked her whether that's true or not and she said yes and at that time the property was
22 under her husband's name so I told her to tell her husband to put the mortgage for her.

23 Q. And what happened?

1 A. And they did it. I took it to my attorney.

2 Q. How long did it take your attorney to draft the documents?

3 A. I'm not too sure about that because my employee took the documents to
4 my attorney.

5 Q. Who's your employee? What's your employee's name?

6 A. It's in my head, I just can't get it out.

7 Q. What documents did your employee take to your attorney?

8 A. Her name is Esther and it was a confirmation note that how much was
9 borrowed in Korean.

10 Q. Okay. Any other documents?

11 A. No other documents. There was no documents that -- that we prepared
12 other than that note that I asked for.

13 Q. Okay. I'm going to show you what I've now marked as Exhibits 1, 2 and
14 3. These are documents that I received from your attorney. Can you look at those for me
15 please? Now, can you tell me which one of those documents, 1, 2 or 3, which one is the -
16 - the document that you're assistant -- your employee delivered to your attorney?

17 A. All three of them.

18 Q. Okay. Were there any translations of those documents?

19 A. That I did?

20 Q. Well, that your employee delivered to your attorney?

21 A. I'm not too sure. This was given to my employee from me and I don't
22 know how she deliver the documents to the attorney.

23 Q. Did you give your employee any other documents besides these three

1 documents?

2 A. No.

3 Q. Okay. The first document, what's the date of that document? Exhibit 1.

4 A. December 1st.

5 Q. Is that December 1st or December 15th? What date was it signed? What
6 did she just say?

7 A. I'm sorry. She first said October 1st and she was referring to the date
8 that's written here.

9 Q. What date was it signed?

10 A. After I came back from Korea this time. This date it was signed -- already
11 signed when I went to get this promissory note. This was after I asked Miss Park Hwa
12 Sun to prepare a mortgage, it was under her husband's name.

13 Q. Okay. Let me see if I understand. Miss Kitami goes to Korea, right, in
14 about September 2005; is that right?

15 A. Yes.

16 Q. In about November 2005 Miss Kitami returns to Saipan.

17 A. Yes.

18 Q. Miss Kitami you played golf with some friends after you returned. And
19 you heard a rumor that Mrs. Park had some financial problems.

20 A. (in English) Yeah.

21 Q. And those problems included a lawsuit by her employees against her.

22 A. Yes.

23 Q. That's right so far?

1 A. Yes.

2 Q. Okay. So then after you found out about Mrs. Park's problems you went
3 and talked to Mrs. Park, right?

4 A. Yes.

5 Q. And she confirmed that she had this lawsuit and she also had some other
6 people that she owed money to.

7 A. She did not specifically mention anything about the money that she owes
8 to other people. What I told her was just -- and neither does she -- she doesn't want to
9 hear anything about that's not her business. So what she asked was just a mortgage. She
10 asked Miss Park to pay back the loan that was made from her and Miss Park said she
11 doesn't have the money and she just asked for the mortgage.

12 Q. Okay. Now, after that is that when you prepared this Exhibit number 1?

13 MR. PIERCE: Objection; assumes facts not in evidence.

14 A. When I demand for a mortgage she told me that the property is under her
15 husband's name and I told her to talk to her husband and come up with a promissory note
16 and that's when they prepared this note, but I did not prepare this -- make this promissory
17 note.

18 Q. Do you know who made the promissory note?

19 A. The husband did.

20 Q. And do you know when he made that promissory note?

21 A. I don't know. It wasn't made -- it wasn't made when I was there, it was --
22 was already made when I got there after a couple of days. It was ready after a couple of
23 days.

1 Q. After a couple of days from when?

2 A. I don't remember how long after I ask for -- how long after I visited them
3 after I asked for the promissory note, could have been five days or a week after.

4 Q. But they didn't have this promissory note when you first went and talked
5 to Mrs. Park?

6 A. Right. It was after I asked them.

7 Q. After you came back in November of 2005 and asked for a mortgage?

8 A. Right.

9 Q. So -- is it your understanding that this promissory note was done some
10 time in -- in December 2005 or January 2006?

11 MR. PIERCE: Objection; vague is the word done.

12 A. I wouldn't know; he's the one who prepared this.

13 Q. When did you receive that document?

14 A. I'm not too sure but it was -- as soon as I got it I gave it to Esther my
15 employee right away.

16 Q. I'm sorry. This Exhibit number 1, this is document in Korean here, that's
17 the document I'm talking about.

18 A. Yes, but it was either given to her right away or after a couple of days, but
19 couple of days at the most.

20 Q. Given to who?

21 A. Esther my employee.

22 Q. Esther's your employee and who gave her this document, Exhibit number

23 1?

1 A. Her meaning her?

2 Q. Give Esther?

3 A. I did.

4 Q. How did you get a copy of Exhibit number 1?

5 A. Mr. Kim Hang Kwon wrote it to me.

6 Q. Okay. When did Mr. Kim Hang Kwon write it to you?

7 A. I don't know because it was already there when I -- after I asked for it.

8 Q. Okay.

9 A. And visited their house after couple of days -- a week after at the most.

10 Q. Okay. Now, to be clear about the time I'm going to go back through this
11 again.

12 A. No matter how many times you ask me I -- there's no way I can track
13 down the time frame. All I know is it was after I came back from Korea but it was too
14 long after.

15 Q. I understand that Miss Kitami. What I'm trying to understand is how you
16 got this paper. Okay? So I'm going to try to summarize what you've said and I want you
17 to confirm whether that's accurate or not. So you came back from Korea in about
18 November 2005.

19 A. Yes.

20 Q. And you heard a rumor about Mrs. Park's -- a lawsuit against Mrs. Park.

21 A. Yes.

22 Q. After you heard that rumor you went and met with Mrs. Park. And you
23 told Mrs. Park you wanted a mortgage on her house.

1 A. Yes, I did.

2 Q. Okay. So we're correct so far?

3 A. You're right.

4 Q. Now, Mrs. Park told you, Miss Kitami, that the house was under the name
5 of her husband, Mr. Kim.

6 A. Yes.

7 Q. Then Mrs. Park told you that she would have promissory notes drafted and
8 a mortgage drafted under Mr. Kim's name to give you the mortgage.

9 MR. PIERCE: Objection; that doesn't assume anything that's been testified to
10 today.

11 A. No, she said she would talk to her husband.

12 Q. About what?

13 A. About the mortgage.

14 Q. Okay. Did she say anything about making promissory notes? She, Mrs.
15 Park, say anything about making promissory notes?

16 A. Yes. She told me not to worry about it, she said she would talk to her
17 husband and -- and no matter what happens she will at least do the mortgage under her.

18 Q. And then Mrs. Kitami left; is that right?

19 A. Going back, meaning back to my house or?

20 Q. Yes. Going -- not with Mrs. Park anymore. She left the meeting.

21 A. Yes.

22 Q. Then some time after that, maybe five days, maybe one week, Mrs. Kitami
23 went back to meet with Mrs. Park again.

1 A. Yes. Probably after a week I went to her house again.

2 Q. Okay. Is it at that meeting with Mrs. Park that you first saw this Exhibit
3 number 1?

4 A. Yes.

5 Q. How about Exhibit number 2? Have you ever seen Exhibit number 2
6 before your second meeting with Mrs. Park?

7 A. Exhibit number 3 --

8 Q. Wait wait -- okay, you have to translate what she said.

9 A. Exhibit number 3 is the first promissory note that I got on my second visit
10 to Mrs. Park Hwa Sun's house. Exhibit number 1 and 2 is the second promissory notes
11 that I got after this Exhibit number 3.

12 Q. All right. Was that at a different meeting than when she received Exhibit
13 number 3?

14 A. This is the first promissory note I got after I demanded for a promissory
15 note -- I'm sorry, a mortgage not a promissory note.

16 Q. And that was the one that she received five days to a week after her first
17 meeting with Mrs. Park?

18 A. Yes, this is the first promissory note after I demanded for a -- a mortgage
19 after I heard about the rumor.

20 Q. Okay. Exhibits 1 and 2, did she receive those at the same meeting as she
21 got Exhibit number 3 or was it a different meeting?

22 A. It was given to me in a different time.

23 Q. Okay. How -- was it before or after when she received Exhibit number 3?

1 A. No, after -- it was given to me after this first promissory note.

2 Q. So she had a meeting where she got Exhibit number 3, right?

3 A. Yes.

4 Q. And then she had another meeting with Mrs. Park after that?

5 A. Yes because I asked for -- for -- for another promissory note because the

6 money was -- the money that I loaned to them was a lot more than \$150,000 and I

7 thought this was not enough so I asked for more promissory notes.

8 Q. Okay. Did she get Exhibits 1 and 2 at the same meeting?

9 A. Yes.

10 Q. And how long was it -- how long was that meeting after the second

11 meeting where she received Exhibit number 3?

12 A. I'm not too sure, but it was soon after the first promissory note when I told

13 them that the money that was borrowed was a lot more than \$150,000 and I asked for

14 more promissory notes with -- with different amounts -- larger amounts.

15 Q. Exhibit -- the meeting -- the second meeting with Mrs. Park, who was at

16 that meeting?

17 A. The couple and I.

18 Q. So Mrs. Park.

19 A. (in English) And then Kim Hang Kwon.

20 Q. Kim Hang Kwon and you, Mrs. Kitami. Three people?

21 A. (in English) Yes.

22 Q. How about the third meeting where you got Exhibits 1 and 2?

23 A. Three -- all three parties were present when I received these documents

1 and only three.

2 Q. And the same three, Mrs. Park, Mr. Kim and you, Mrs. Kitami?

3 A. Yes.

4 Q. Have you had any other meetings with Mrs. Park since the third meeting
5 where you received those promissory notes?

6 A. Yes.

7 Q. When was your next meeting after that, after you received those notes?

8 A. Well, we -- we bumped in to each other at restaurants and some other
9 places but we did not actually discuss or argued about -- about this matter anymore after I
10 received these promissory note.

11 Q. Okay. Do you know where Mrs. Park is now?

12 A. I heard -- her husband told me that she went to Korea.

13 Q. Do you know when she went to Korea?

14 A. No I don't.

15 Q. How much does Mrs. Park owe you?

16 A. \$350,000.

17 Q. Does Mr. Kim also owe you any money?

18 A. No he doesn't.

19 Q. Does any -- does -- does Jung Jin Corporation owe you any money?

20 A. No.

21 Q. How about Asia Enterprises Inc? Does Asia Enterprises owe you any
22 money?

23 A. No it was always -- it was always personal. What happened was Miss

1 Park Hwa Sun would always call me and when -- when the money is needed -- was
2 needed and her husband would come to me and -- and collect the money -- or get the
3 money from me -- borrow the money from me.

4 Q. So this \$350,000 wasn't one loan, it was a number of smaller loans; is that
5 right?

6 A. The most that was borrowed -- and I mean lend at one time was \$150,000.

7 Q. When was that?

8 A. I don't clearly remember but it's around the year 2004.

9 Q. When was the first time you loaned Mrs. Park money?

10 A. I don't clearly remember, but we Koreans we just -- without any
11 documents we just lend out money and get our money back that's how we socialize.

12 Q. So how -- so how do you ever know how much money another Korean
13 owes you?

14 A. Because when the money is loaned in -- in small amounts, let's say
15 \$5,000, \$10,000, \$20,000 the money is paid back in lump sum, in one time. And it's --
16 it's not a small amount of money and it -- I just remember other money that's being lend
17 out to or being paid back.

18 Q. Okay. What -- all right. So you don't remember the first time that Mrs.
19 Park borrowed money from you?

20 A. I don't know. I don't remember. There was a time where -- when I
21 borrowed money from her and she borrows money from me too.

22 Q. Do you know how much money it was the very first time that Mrs. Park
23 borrowed money from you?

1 A. I don't know that. But usually between five to thirty thousand dollars.

2 Q. This -- did you make any notes or write anything down when she would
3 borrow money from you?

4 A. No.

5 Q. Now, she -- you said that she loaned you money also, right?

6 A. Yes.

7 Q. Do you know when that was that you borrowed money from Mrs. Park?

8 A. We were friends, we were long time friends, it was a long time ago since I
9 first borrowed money from her.

10 Q. When you borrowed the money from Mrs. Park did you write down how
11 much you owed Mrs. Park?

12 A. No. That's not how it works.

13 Q. How about this \$150,000 that was -- that Mrs. Park borrowed from you in
14 about 2004, did you write down how much she borrowed at that time?

15 A. No.

16 Q. Beside the -- the Exhibits 1, 2 and 3, are there any documents of which
17 you're aware that would show Mrs. Park borrowing \$150,000 from you?

18 MR. PIERCE: Objection; vague and ambiguous as to show.

19 A. No there isn't. This is all.

20 Q. In 2004 when Mrs. Park borrowed \$150,000 from you, you said Mr. Kim
21 is the one that came to pick up that money?

22 MR. HANSON: I'm sorry, Alex. You need to translate what she's saying. If she
23 has questions about it then we can work that out. I'll ask another question.

1 TRANSLATOR: Okay.

2 MR. HANSON: Just translate it verbatim, exactly what she says.

3 TRANSLATOR: I was just verifying your question.

4 MR. HANSON: Don't verify, just translate. We can correct it.

5 TRANSLATOR: All right.

6 A. With these two promissory notes these two are small amounts of money
7 that her husband who come to me and gets the money from me. But with this I can
8 clearly remember because \$150,000 was a -- was a mortgage that I got from a bank in
9 Korea.

10 Q. Okay.

11 MR. PIERCE: Loan or mortgage?

12 MR. KIM: [unclear] is a mortgage and get a loan and gave it to Mrs. Park.

13 MR. HANSON: I can clarify.

14 Q. All right. Now, when you said these two, you were referring to Exhibits 1
15 and 2; is that correct?

16 A. Yes.

17 Q. And you said but this one with regard to the \$150,000 that Mrs. Park
18 borrowed, that's Exhibit 3 is what you were pointing to; is that correct?

19 A. Yes.

20 Q. Now, with the \$150,000 explain to me -- and I want to understand how
21 this occurred. Mrs. Park came to you and -- did she come to you and ask you if she could
22 borrow \$150,000?

23 A. Yes.

1 Q. And what did you say?

2 A. Why was it needed.

3 Q. What did she say?

4 A. She's -- she's building a house.

5 Q. What else did she say?

6 A. I don't know about anything else. All she said was she's building a house.

7 Q. And then what did you say?

8 A. Well, then this was in Korea so she's got a mortgage from -- loan from the
9 bank and put my house under a mortgage.

10 Q. So -- this conversation you had with Mrs. Park this was in Korea?

11 A. It was through telecommunication.

12 Q. Okay. You were in Korea at the time that Mrs. Park asked you for the
13 \$150,000 loan?

14 A. Yes probably.

15 Q. Probably. Then you went to a bank in Korea and borrowed \$150,000?

16 A. Yes.

17 Q. To give that to Mrs. Park; is that right?

18 A. Yes.

19 Q. And you mortgaged your house again?

20 A. It's a different house.

21 Q. So this isn't -- you mortgaged -- this isn't the same house that you
22 mortgaged to build the apartments?

23 A. Different house.

1 Q. Who owned the house that you mortgaged? At the time that you
2 mortgaged it who owned the house that you mortgaged for the \$50,000 to build the
3 apartments?

4 A. Mine.

5 Q. At the time that you mortgaged it, who owned the house that you
6 mortgaged for the \$150,000 loan that you gave to Mrs. Park?

7 A. Mine.

8 Q. Okay. Besides those two loans with the mortgages, have you ever
9 borrowed any other money from a bank in Korea for any reason?

10 A. No.

11 Q. Have you ever mortgaged any other property in Korea for any reason?

12 A. No.

13 Q. Have you paid off the loan, the \$150,000 loan that you -- that you took out
14 to give the loan to Mrs. Park?

15 A. No not yet. There's a balance.

16 Q. What's the balance?

17 A. Between \$50,000 to \$60,000.

18 Q. So you've already paid \$90,000 to \$100,000 of the principle?

19 A. Yes.

20 Q. Plus interest, right?

21 A. Yes.

22 Q. Is the mortgage -- is there still a mortgage on your house for that loan?

23 A. Yes.

1 Q. How -- who's the one who made the principle and interest payments on
2 the \$150,000 loan?

3 A. I did.

4 Q. Where did you get the money to make the principle and interest payments
5 on the \$150,000 loan?

6 A. My husband gives it to me.

7 Q. Okay. Did Mrs. Park ever give you any money to pay off any part of the
8 \$150,000 loan?

9 A. No.

10 Q. Are you paying interest on the \$150,000 loan that you borrowed from the
11 bank in Korea?

12 A. Yes. That's how I -- that's how I got the mortgage from Miss Park Hwa
13 Sun.

14 Q. Okay. Have you -- in this Exhibit 3 is that the amount of money -- never
15 mind that. Do you expect Mrs. Park to pay back the interest that you have to pay on this
16 loan that you took from the bank in Korea?

17 MR. PIERCE: Objection; vague.

18 A. She should. That's how I got the mortgage because she doesn't have the
19 cash right now.

20 Q. And when you say that's how she got the mortgage are you talking about
21 the mortgage that Mrs. Park and Mr. Kim gave you on their house in Saipan?

22 A. Yes.

23 Q. Okay. Has Mrs. Park promised to pay back the interest that you have to

1 pay the bank in Korea?

2 A. Yes.

3 Q. Is that promise in writing?

4 A. No. Verbal.

5 Q. Now, you took out this \$150,000 loan from the bank in Korea, how did
6 you receive that -- the money from that loan? Did the bank issue you a check or send you
7 a wire transfer?

8 A. In Korea they have what we call cash check. They have -- it's issued from
9 the bank and with large amount of money and I went to -- I personally went to the bank
10 and got that cash check from the bank.

11 Q. Whose the name on the cash check? Who was it payable to?

12 A. It's like a -- it's good as a cash, it's like a traveler's check without a name,
13 as long as it's issued from an authorized bank it's just good as cash. Anybody can use it.

14 Q. Is that what she just said or are you now testifying?

15 A. It's as good as cash. There is no name written on the cash -- check.

16 Q. So she got a cash check for \$150,000 from the bank in Korea without any
17 name on it?

18 A. Yes.

19 Q. What did she do with that cash check?

20 A. It was borrowed to Miss Park Hwa Sun.

21 Q. Okay. Did you actually physically give her the check, Miss Park the
22 check?

23 A. I think her sister, her younger sister came to me -- was living in Korea and

1 got the cash from me.

2 Q. Got the cash or got the cash check?

3 A. Got the cash check.

4 Q. Ask the question.

5 A. Okay, in Korea cash is cash check, check is cash.

6 Q. Okay. But they have Korean Won, right?

7 A. Yes.

8 Q. Was it a stack of Korean Won or was it just a --?

9 A. No, it's not a -- no it's a cash check.

10 Q. So it looks like a bank check?

11 A. Yes.

12 Q. Looks like a check that is drafted from the bank but left blank, paid to the
13 order of blank?

14 A. Well, no. There is no category as paid -- in paid to or order of. It just
15 indicates the amount.

16 Q. Now, this cash check Mrs. Park gave it to -- I'm sorry, Mrs. Kitami gave it
17 to Mrs. Park's sister?

18 A. I think so, in Korea. I don't clearly remember.

19 Q. What was the name of this -- the sister?

20 A. I don't know.

21 Q. Did you know at the time what her name was?

22 A. No I didn't because her -- Miss Park Hwa Sun's sister called me and
23 confirmed with me that she was -- Miss Park was her sister and her -- the sister was told

1 to come and get the money from her -- from me.

2 Q. Now, this cash check is -- it's good as cash, right, whoever holds it can get
3 the \$150,000; is that right?

4 A. Yes.

5 Q. And you gave that cash check to this woman who said she was Mrs.
6 Park's sister?

7 A. Yes.

8 Q. Did you get her to -- did you look at her identification to see if she was
9 who she said she was?

10 A. No, there was no need for that because she's the younger sister of my
11 friend.

12 Q. Had you met her before?

13 A. Once or twice.

14 Q. With Mrs. Park?

15 A. No separately when Miss Park was -- asked her sister to deliver something
16 to me or -- or when I needed something to pass -- pass on the -- merchandise or
17 something.

18 Q. Did you make a copy of the cash check that you gave to Mrs. Park's
19 sister?

20 A. No. We -- we trust each other.

21 Q. So did she give you a receipt acknowledging that she had received the
22 \$150,000 check, cash check?

23 A. No.

1 Q. Do you know what Mrs. Park's sister did with the cash check after you
2 gave it to her?

3 A. I wouldn't know but I'm assuming they must have talked between the two
4 of them and maybe bought some materials that was needed for the construction or
5 something from Korea.

6 Q. The -- the other \$200,000 that you say Mrs. Park owes you, how was that
7 money loaned to Mrs. Park?

8 A. The way I mentioned to you before was in small amounts of money, they
9 most amount that was borrowed at once was \$50,000 for this two cases -- in \$200,000.

10 Q. The most amount was borrowed was \$50,000 --

11 A. At once, at once.

12 Q. Was \$50,000?

13 A. Yes. It was always borrowed for -- little by little.

14 Q. This money that you loaned, would you give her, Mrs. Park, cash or write
15 a check? How did you loan the money to her?

16 A. Cash.

17 Q. Always cash?

18 A. Yes.

19 Q. Did Mrs. Park ever give you a receipt acknowledging that she received the
20 cash?

21 A. No, but she probably has some kind of notes for herself of how much
22 she's borrowed from me.

23 Q. How about you, did you have any notes to yourself on how much you

1 loaned to her?

2 A. No, I don't do that.

3 Q. So this \$200,000 that you -- you say Mrs. Park owes you, are you -- are
4 you guessing that that's the amount that she owes or do you know for sure it's \$200,000?

5 A. No, I'm guessing. I'm thinking it's close to \$200,000 and they probably
6 think the same way. That's probably why the husband wrote for \$200,000.

7 Q. But you're not sure, it's somewhere around \$200,000?

8 A. Yes, I'm not too sure because it was always loans in 20,000, 5,000,
9 10,000, 30,000, 50,000, it was in numerous occasions. And they should know better than
10 I do.

11 Q. When was the last time you loaned Mrs. Park money?

12 A. Probably last year.

13 Q. When last year?

14 A. Maybe around March. Her husband -- not sure of the time but her
15 husband came to me and took \$30,000.

16 Q. And that was the last time you loaned them money?

17 A. Yes.

18 Q. Do you know what the -- the \$200,000 that's part of Exhibits 1 and 2, do
19 you know what Mrs. Park did with that money?

20 A. I don't know, but she -- she does run a business.

21 Q. Did she ever tell you what she did with that money?

22 A. Once you -- once the money is loaned or borrowed that's it.

23 Q. When she would come and ask you for -- to borrow money, did she say

1 why she need -- ever say why she needed the money?

2 A. Yes, but -- yes, in occasions she would tell me the money was needed to
3 pay the employees salary, or she's having difficulties with the business.

4 Q. So it's your understanding that the loans -- these \$200,000 in loans were to
5 operate her business?

6 A. I don't know she could be lying to me.

7 Q. She could be lying, but is that what she told you?

8 A. Yes, she would tell me that she needs to pay her employees salary or -- or
9 that she's having financial difficulties with the -- with her business.

10 Q. One last question and then I think I'm finished. Do you have the
11 documents for the loan and the mortgage for the \$150,000 that you borrowed in Korea?

12 A. I have a loan -- mortgage from the bank. That's all I have.

13 Q. Is that -- where -- where are those doc -- where's that mortgage document
14 located?

15 A. The bank.

16 Q. I'm sorry?

17 A. The bank.

18 Q. What bank?

19 A. It's called Hana Bank.

20 Q. Did they give you a copy of the loan and mortgage documents?

21 A. They probably didn't. It's -- my understanding is they would only get back
22 to me when the loan is paid off.

23 Q. Is there any documents that they gave you to show what the terms of your

1 repayment of that \$150,000 loan is?

2 A. No. The time -- the banks in Korea when you get a loan from the bank the
3 time frame is very flexible. As long as you pay the interest the principle amount can be
4 paid any time. There's no set limit, time set -- I mean, period.

5 Q. Do you have any other documents besides these three promissory notes
6 that shows how much Mrs. Park owes you?

7 MR. PIERCE: Objection; vague in the word shows.

8 Q. And by show I mean anything that I could look at that would help me
9 understand how much Mrs. Park owes you.

10 A. This is the Korean style. I haven't got this -- I only got this when I came
11 back from Korea last November and before that I didn't even have anything.

12 Q. Are there any -- besides the mortgage and the two -- it looks like you have
13 two liens on cars; is that correct? That are owned by Mr. and Mrs. Park -- I mean, Mr.
14 Kim and Mrs. Park?

15 A. That's all there is.

16 Q. Do you have any other agreements with Mrs. Park that -- besides the
17 mortgage -- what's stated in the mortgage and the promissory notes?

18 A. No. No there isn't.

19 Q. No other understanding between you and Mrs. Park or Mr. Kim about
20 them transferring any business to you or any assets to you in exchange for the money that
21 -- that they owe you?

22 A. No. That's all I got this morning. This is -- this is a headache to me too
23 and this is the last hope of any chance for me to get my money back.

1 Q. Okay.

2 MR. HANSON: Well, I want to thank you for coming today. I understand that
3 you've had to take time and you have to bring your lawyer, but I do appreciate your --
4 your cooperation. There may be some more documents that I will need from you but I
5 will talk to your lawyer about that. But thank you very much. Thank you, Dick. Thank
6 you, Steve.

7 MR. PIERCE: We want to review it, so we want 30 days, okay?

8 MR. HANSON: If I prepare transcripts I'll have you review.

9 MR. PIERCE: You're not going to prepare them?

10 MR. HANSON: I might not.

11 Okay. Did anybody else want to make a record or cross examine, just before I
12 close the deposition? All right, if there's nothing further to put on the record I'll close
13 this deposition. Thank you very much.

14 END OF DEPOSITION

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LIST OF EXHIBITS

- Exhibit 1. Promissory note written in Korean. (1 page)
- Exhibit 2. Promissory note written in Korean. (1 page)
- Exhibit 3. Promissory note written in Korean. (1 page)

CERTIFICATE

I, KIM PIL SUN KITAMI, hereby certify that I have reviewed the pages of the foregoing testimony of this deposition and I hereby certify it to be a true and correct record.

Date: _____

KIM PIL SUN KITAMI

RULE 30(f)(1) Certification

I, Mark B. Hanson, do hereby certify:

That the foregoing deposition was taken by digital voice recording on the 21st of February, 2006 in the office of Mark B. Hanson and that the deponent was duly sworn by the undersigned Notary Public for the CNMI;

That the foregoing pages are a true and accurate record of the testimony of the deponent made from the examination record made at the time of the deposition and transcribed under my direction and thereafter verified by me to the best of my knowledge and ability;

That, pursuant to Rule 30(e), by notice to the Deponent and her attorney delivered March 31, 2006, the Deponent was provided with thirty (30) days to review and submit a statement in accord therewith;

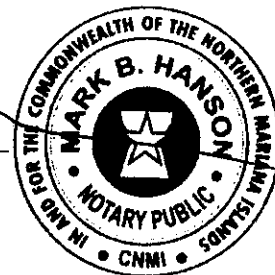
That no statement of changes prescribed under Rule 30(e) was received from Deponent; and

That counsel for the deponent has been notified, this day, of the completion of this transcript, the original of which is hereby filed with the office of Mark B. Hanson.

Sworn this 28th day of June, 2006 in Saipan, Commonwealth of the Northern Mariana Islands.


MARK B. HANSON

MARK B. HANSON
NOTARY PUBLIC
Commonwealth of the Northern Mariana Islands
My Commission Expires: 8 DEC 2006
P.O.Box 5682 CHRB Saipan, MP 96950



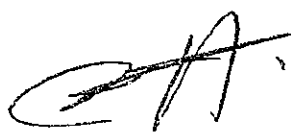
Exhibits

과용 용서.

본인 김 항권은 김 집순으로 부터
 무무의 손해 집을 담보로 이차 \$ 100,000을
 2004년 12월 15일 주 과용합니다.
 지분보좌는 10월 1일 2005년 자리이며
 만약 기한을 지키지 못한다면
 집과 땅에 관한 권리를 포기하며
 어떠한 법적인 문제도 제끼리 아니 할것임은
 서약 합니다.

2004년 12월 15일

서약인, 김 항권.



과용증서.

본인 김항권은 김집순으로부터.

수취한 인제 재산을 양전도 비록 \$ 100,000을

2005년 3월 1일을 과용합니다.

과용 날짜는 2005년 10월 1일 까지이며.

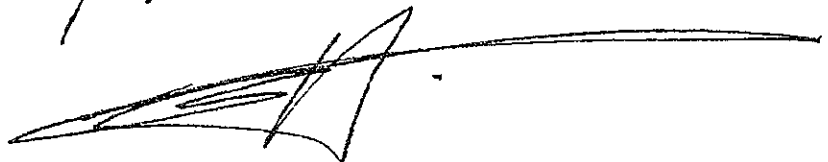
한정 기간은 이렇듯 불합치/에는

과다 양에 대한 책임을 지지하며.

이러한 양전문제로 제기된 사항들은
서명합니다.

2005년 3월 1일

김항권, 김항권



차용증서

본인 김항권은 김계환으로 부러.
우측에 신대 집을 담보로
비리 ₩ 150,000 원
2004년 3월 5일 날 차용합니다.

자본실패는 10월 1일 2005년 자리이며

비리 금리를 지키지 못함시에는
장래담보에 관하여 모든채권을

강제하여

비리한 법적문제로 지키지 아니 할것임을
서약합니다.

2004년 3월 5일.

김계환 김항권

김항권